Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Application by Qwest Communications	)	
International Inc. for Provision of	)	
In-Region, InterLATA	)	CC Docket No. 02-148
Services in Colorado, Idaho, Iowa,	)	
Nebraska and North Dakota	)	
	)	

REPLY DECLARATION OF SHERRY LICHTENBERG

1. I am the same Sherry Lichtenberg who filed a declaration in this proceeding in conjunction with WorldCom's initial comments. The purpose of my reply declaration is to update the information I provided in my earlier declaration and also to respond to comments made by other parties. I will not repeat the analysis I provided previously.
2. The complex nature of Qwest's pre-order and order process has become even more clear in recent weeks. Qwest's complex processes forces WorldCom to spend far more time to place an order in the Qwest region than elsewhere, requires more development resources, and leads to an extremely high reject rate. Region-wide, Qwest rejected 37.8% of the orders it received from all CLECs via the IMA GUI in June and rejected 32.3% of the orders it received via EDI. (Perf Results, PO-4A-1, 4A-2, 4B-1, 4B-2). In July (through July 12), Qwest has rejected 32.5% of WorldCom's orders region-wide. As was the case in prior months, this is far higher than the reject rate in other regions in which WorldCom is offering its Neighborhood products in conjunction with Z-Tel. The average reject rate in those regions during the same time period was 16.8%, approximately half the rate in the Qwest region. (The reject rates on orders submitted through WorldCom's legacy systems in these other regions was lower still.) In the SWBT region, for example, the

reject rate in July was 11.4% on WorldCom orders placed through Z-Tel, and in the BellSouth region it was 14.1%. In each of these regions, WorldCom first began submitting orders through the Z-Tel systems in April of this year, as it did in the Qwest region, thus the reject rates should be similar if Qwest's systems are comparable to those in other regions.

3. The reason that reject rates are far higher in Qwest than elsewhere and that placement of orders is more complicated in Qwest than elsewhere is that critical OSS deficiencies exist in Qwest: (1) Qwest requires CLECs to perform an address validation function using the customer's full service address prior to pulling a Customer Service Record ("CSR"); (2) Qwest requires CLECs to place a service address on every order; (3) Qwest requires CLECs to place a special customer number ("cus code") on every order; (4) Qwest often returns multiple CSRs for a single customer; (5) Qwest requires CLECs to list the customer's pre-existing line class code and some pre-existing features on every order; (6) Qwest often takes more than a week to update a customer's CSR, and rejects supplemental orders until the CSR is updated.

4. The fact is that it is often only with commercial experience that OSS problems became apparent. As a result of extremely high UNE prices that existed until shortly before Qwest filed its section 271 application, there was very little commercial entry in the Qwest region by CLECs seeking to serve the residential market. The Department of Justice notes that the low market penetration for UNE-P residential service "may reflect the higher UNE pricing that was in effect for most of the period preceding this application." DOJ Eval. at 13. As the Department of Justice explains in its evaluation, with the exception of Iowa, where CLECs serve 1.9% of the market using UNE-P,

CLECs service no more than .5% of the residential market in any of the other 4 states at issue in this application using UNE-P. DOJ Eval. at 12. Indeed, even in June, Qwest received only 6,417 UNE-P orders via EDI in its entire region. (Qwest Perf. Results (PO-2A-2)). Moreover, as I previously explained, because Qwest's OSS is not fully regional and because many of the "UNE-P" orders Qwest has received are not real UNE-P orders but instead are a variant called UNE-E, Qwest's commercial experience is even less significant than it appears.[1] The result is that Qwest lacks the commercial experience that would have revealed critical OSS deficiencies and potentially led to correction of these deficiencies. As WorldCom has begun to gain commercial experience, such deficiencies have become apparent. These include not only issues leading to high reject rates and a cumbersome process but other important deficiencies as well.

Systems Issues Leading to High Reject Rate

5. In my prior declaration, I explained three of the systems issues that are contributing significantly to the high reject rate in the Qwest region: failure to allow migration by name and telephone number, inadequate integration of pre-order and order, and failure to allow CLECs to list only the features the customer now desires on the customer's migration order. Qwest has not responded effectively to any of these issues in its various *ex parte* filings. Nor has it agreed to alter its systems to fix these problems. As will be discussed further below, CLECs have ranked these changes relatively high during recent

[1] The Department of Justice indicates that Qwest's OSS is regional and can be evaluated on a regional basis. DOJ Eval. at 6-7. But the third party test sent separate test transactions in each of Qwest's three sub-regions because it could not be presumed the OSS was identical throughout the region. KPMG's regionality study concluded there were differences between the three sub-regions and Qwest agreed with this. Moreover, Qwest has recently relied on differences in OSS between the three sub-regions to justify different performance. It has, for example, explained that it takes less time to update Customer Service Records in one of the three sub-regions than the others.

prioritization of CLEC change requests. But the earliest Qwest will implement such changes will be April of next year.

6. I have now come to understand that the pre-order/order process in Qwest is even more complicated than I previously believed. In the Qwest region, a CLEC must first perform an address validation function before accessing the customer's CSR. Unlike in other regions, the CSR cannot be accessed simply with the customer's telephone number. The customer's full service address must be entered. Because customer service representatives sometimes err in typing addresses, however, and this could lead the representative to pull the wrong CSR, Qwest has told CLECs they should first perform an address validation function before even accessing the CSR. This is an extra step that CLECs do not have to perform for migration orders in other regions. Moreover, the address validation function also requires the typing of the full service address, rather than just the telephone number. In other regions, if a CLEC wishes to use the address validation function, an optional step, only the telephone number is required.
7. Once the customer service representative has typed the address into the address validation function, Qwest will often return multiple addresses. In some cases, the customer's prior addresses will be returned along with his current address. In other cases, the addresses of prior owners of the relevant telephone number will come up. And in still other cases the new addresses of former residents of the entered-address will appear. The customer service representative must then determine the proper address by discussing it with the customer and then pull that address to use in the CSR inquiry.
8. Once the customer service representative has determined the proper address, the representative then performs the CSR inquiry by using that address and the customer's

telephone number. Unfortunately, despite requiring CLEC to include the address and telephone number as part of the CSR inquiry, Qwest frequently returns more than one CSR in response to the CSR inquiry. This can include CSRs that used to belong to the customer, for example. It can also include CSRs of different customers – for reasons that WorldCom does not understand. It appears that Qwest's systems provide multiple CSRs approximately 10% of the time in response to a CSR inquiry.

9. The CLEC must then determine which is the correct CSR. Although there is an indicator on the CSR that says whether that particular CSR is "live" (working), this indicator is not always correct. WorldCom has found instances in which there is more than one CSR listed as live in response to a single CSR inquiry. The CLEC must therefore determine by asking the customer which CSR is correct. Like the steps involved in service address validation, this step adds time to the pre-order stage while the customer is on the line – decreasing the efficiency of the representative and potentially angering the customer.
10. At the moment, this last step is a theoretical one as far as WorldCom is concerned. Because WorldCom (and Z-Tel) had no reason to anticipate that Qwest would return multiple CSRs, the Z-Tel interfaces were not built with the capacity to pull multiple CSRs to the desktops of the WorldCom customer service representatives. For now, when there are multiple CSRs, the representative will get an error message in response to a CSR inquiry. The representative will have to attempt to complete the order based on information available to him from the customer, without access to the CSR, a process that very probably will result in a reject. Z-Tel hopes to complete development work that will allow multiple CSRs to be displayed on the desktops of WorldCom customer service

representatives. But this is significant development work that should not have been required. No other ILEC returns multiple CSRs at the pre-order stage.

11. Once the representative finally has pulled the correct CSR, Qwest's ordering process remains cumbersome. Numerous pieces of information must be pulled from the CSR and placed on the order. None of this information is required by any other BOC for a UNE-P migration order. First, as I described in my initial declaration, the CLEC must place the complete service address on the order. Second, the CLEC must place information regarding the customer's existing features and line class codes on the order. This information is slightly different than I previously thought, however. In my prior declaration, I said that the CLEC must place every existing feature on the order, as well as every new feature. This needs to be modified somewhat. For line class codes, the CLEC must place the customer's existing code on the order, just as I indicated. There are hundreds of possible line class codes in Qwest. With respect to features, however, the CLEC must only place the customer's current features on the order if the customer wishes to keep those features as a CLEC customer. If, for example, the customer has caller ID and wishes to keep caller ID, the CLEC must list caller ID as a current feature and as a new feature, along with a code indicating the customer wishes to keep the feature the same. If the customer wants to add an entirely new feature, the CLEC must include a code indicating the feature is new. If the CLEC treats an existing feature as a new feature or a new feature as an already-existing one, the order will reject. Thus, the CLEC must determine which features are already on the account and place the proper codes on the order to show which of these features the customer wishes to keep and which new features he would like to add.

12. Third, and something that I did not highlight previously, the CLEC must place a "customer code" on each order. Apparently, Qwest assigns each retail customer a unique customer code and the CLEC must place this code on a migration order for it to be processed correctly. Again, this unnecessary piece of information must be retrieved from the CSR and any difficulty in transferring this information to the order (or any internal Qwest error in placing the code on the CSR) will lead to rejection of the order.

13. Each of these requirements is unique to Qwest. In other regions, CLECs do not have to retrieve a service address prior to entering an order. If they do perform an address validation, they can do so using a telephone number without entering the address. When CLECs perform a CSR inquiry in other regions, only one CSR is retrieved. Moreover, integration of pre-order and order is much simpler because CLECs do not need to pull significant information from the CSR to place a basic migration order. They do not have to include a line class code, or existing features, or the customer code on an order. They also do not need to include the service address. Thus, none of these pieces of information are a source of possible rejects.

14. The requirements in Qwest cause several difficulties for CLECs. First, they force CLEC customer service representatives to spend too much time on the line with customers. Performing an address validation function, choosing among multiple addresses, and potentially choosing among multiple CSRs while the customer is on the line adds significant time to the pre-order process. It is vital for CLECs in a mass market environment to be able to reduce the time that customer service representatives spend on the phone with each customer..

15. Second, the complexity of Qwest's systems adds significantly to CLEC development costs. The complexity has made it far more difficult to develop integrated pre-order and order functions. It is also forcing Z-Tel to work with its vendors to develop a method of displaying multiple CSRs on the desktops of customer service representatives.

16. Third, the complexity is a direct cause of the high reject rate. The need to include a service address, line class codes etc. makes it much more difficult to integrate pre-order and order successfully. Moreover, if the CLEC does not choose the correct address through the address validation function or the correct CSR through the CSR inquiry, the order will reject. It also appears that Qwest will reject an order if the CLEC has not performed a required pre-order function, such as address validation, even if the CLEC places the proper information on the order.

17. In its evaluation, the DOJ noted the high reject rate in the Qwest region, DOJ Eval. at 14-15, but suggested the reject rate was similar to that which existed in BellSouth. DOJ Eval. at 15 n. 61 (citing *Ga/La Order* App. B at 14-15). However, the BellSouth numbers actually show reject rates of between 12.75% and 14.33% on UNE-P mechanized orders in the last three months for which BellSouth provided data during its application. *Id*. BellSouth's reject rate for partially mechanized UNE-P orders was approximately equal to the rate of rejection in the Qwest region for overall UNE-P orders, including mechanized orders. Thus, the overall reject rate in BellSouth was much lower than the reject rate in Qwest. Moreover, in the BellSouth region, unlike the Qwest region, WorldCom's reject rate was similar to that in other regions by the time BellSouth filed the applications that ultimately received approval.

18. At least as important, Qwest cannot blame CLECs for the high reject rates that exist in the Qwest region. First, Hewlett Packard itself experienced very high reject rates during testing. Second, the fact that WorldCom's reject rates are much higher in the Qwest region than elsewhere strongly suggest that Qwest is responsible. Third, as the DOJ noted, DOJ Eval. at 16, the fundamental causes of high reject rates in the Qwest region were not present in prior applications: the requirement to include a service address on every order, the requirement to list a customer's existing features on every order, and the other systems issues discussed above. The DOJ did not resolve these issues, instead stating that it would evaluate the integration issues as relevant to the degree and adequacy of manual handling. DOJ Eval. at 16. But in reality, the primary impact of high reject rates caused by Qwest's deficient OSS is on the CLECs' side of the interface. It is the CLEC that must spend time and effort attempting to correct the rejects and resubmit them. It is the CLECs' customers whose orders are delayed as a result.

19. In *ex parte* filings on July 25 and July 26, Qwest indicates that during the third-party test, Hewlett Packard managed to successfully integrate pre-order and order functions and that a CLEC called New Access did so commercially. But the reject rate Qwest provides in its *ex parte*, at least with respect to Hewlett Packard, and presumably with respect to New Access as well, pertains to fatal rejects only. As for fatal rejects, the *ex parte* actually shows a very high percentage of fatal rejects, which are ordinarily quite low.

20. Moreover, the total percentage of orders returned to Hewlett Packard for correction is provided in the test report and was well over 30% -- 33.6% in the Eastern region, 40.5% in the Central region, and 32.1% in the Western region, using interfaces that ostensibly had been integrated. Even if the errors did not result from integration issues per se, the

complexity of Qwest's requirements surely contributed significantly. If Qwest did not require transmission of address information, for example, there would be no address errors.

21. As for New Access, I do not know how many orders New Access has placed or what its mix of orders is or what its reject rate is when non-fatal rejects are included. But it is likely that the order volume is low and that it includes resale orders rather than UNE-P orders. Moreover, New Access did not even complete integration until June, hardly sufficient time to evaluate reject rates. But it is clear that for most CLECs the complexity of Qwest's systems continues to cause significant problems, resulting in very high average reject rates. During testing, HP noted the significant challenges in developing a successfully integrated pre-ordering/ordering interface. LN-OSS 11 at 9, 25-27. There is no reason it should be so difficult to develop an integrated interface. And whether or not it is problems with integration or more general systems and documentation issues that are the cause, it is clear that the complexity of Qwest's systems continues to cause high reject rates. The reject rate in the Qwest region is simply too high and there is no immediate prospect of any change.

22. The reject rate on supplemental orders WorldCom submits to correct rejects is also extremely high in the Qwest region, adding to the difficulty of serving customers. While the "re-reject" rate is high everywhere that WorldCom is submitting orders through Z-Tel systems, it is much higher in the Qwest region than elsewhere. In June, the "re-reject" rate was a staggering 77.8% in the Qwest region as compared with 54.7% on orders submitted through Z-Tel in other states. The week of July 7-12, the re-reject rate was 88.0% in the Qwest region compared with 60.1% elsewhere.

23. Two key OSS changes would significantly reduce most of these problems. Qwest should enable CLECs to place orders based on customer name and telephone number – without the need for a service address or customer code. And Qwest should adopt the industry standard version of migration as specified – in which a CLEC need list only the features a customer desires in the future – without regard for whether the customer already has those features or the customer's existing line class code. These changes would eliminate the need for a CLEC to perform an address validation on a UNE-P migration order, would make pre-order/order integration far simpler, and would significantly mitigate the harm caused by Qwest's return of multiple CSRs. (Of course, it would be better still if Qwest also cleaned up its databases and stopped returning multiple CSRs.)

24. None of the changes would require much effort from Qwest. Other BOCs were able to implement migration by name and telephone number (or a slightly different variant – migration by name and street number) quickly once they decided to do so. Similarly, all have implemented ordering processes that required CLECs to list only the customer's new features on migration orders – the industry standard version of "migrate as specified." They did so early in the process of OSS development. This should be particularly easy for Qwest, because it apparently once allowed customers to place orders using just such a process before unilaterally determining that this was not in the CLECs' best interest and implementing its current process.

25. CLECs have now prioritized the industry standard version of migration as specified second in change management. They have prioritized migration by name and telephone nineteenth. In addition, CLECs prioritized third an AT&T request that would enable CLECs to retrieve CSRs without entering the customer's name and address. Each of

these change requests is critical and must be implemented before Qwest gains section 271 authority.

26. But Qwest will not implement any of the prioritized changes until April 2003. Moreover, WorldCom's change request for migration by name and telephone number may well not make it into the April 2003 release and may be postponed until August 2003 or even later. Although CLECs prioritized the request quite high – nineteenth – there may be insufficient release space in April for this change to make it into the release. Presumably, the reason that CLECs did not prioritize the change even higher is that many smaller CLECs primarily desired changes necessary to facilitate ordering via the IMA GUI, rather than EDI, especially since Qwest indicated that the migration by name and telephone number functionality would take significant release space.

27. This should not obviate the necessity for Qwest to implement migration by name and TN prior to gaining section 271 authority. The fact that there are also significant limitations in Qwest's IMA GUI that smaller CLECs want fixed (e.g., Eschelon Comments at 6-7 (discussing cumbersome nature of GUI) should not eliminate Qwest's obligation to make changes necessary for effective ordering by larger CLECs via EDI. At present, the complexities of Qwest's pre-order/order process deny such CLECs a meaningful opportunity to compete.

Difficulties in Placing Orders for Account Maintenance

28. The complexity of Qwest's systems not only makes it difficult for CLECs to place initial orders. It also makes it difficult for CLECs to place orders to change features or perform other "account maintenance." The CLEC should not have to access Qwest's systems at

all to place such orders because the customer's address information and other information has already been imported into the CLEC's systems.

29. Nonetheless, Qwest forces CLECs to perform pre-order functions even on these "Move, Add, Change, Delete" or "MACD" orders. When a customer migrates to a CLEC, Qwest changes the customer code for that customer. Thus, the customer code the CLEC obtained from the CSR when it submitted its initial order is not the proper customer code when the customer submits a MACD order. Even though the customer is now the CLEC's customer and the CLEC is maintaining its own records for the customer, the CLEC must access Qwest's systems and obtain the new customer code in order to place a MACD order. This adds significantly to the time and expense of placing such orders and to the development cost involved in placing such orders.

30. Moreover, Qwest rejects MACD orders if it has not yet updated the customers CSR to reflect the fact that the customer is now owned by a CLEC. While other BOCs do this as well, the problem is much more acute in the Qwest region. Qwest has informed WorldCom that it normally takes 5-7 days to update a CSR and can take up to 30 days. That is far too long. Customers frequently request a feature change on their account soon after placing an order, as they change their minds as to what features they desire. CLECs need to be able to submit orders for such a change quickly after submitting the initial orders. WorldCom's reject rate on MACD orders is 29.0%; presumably, much of this is the result of BellSouth's failure to update the CSRs quickly enough. The reject rate should be much lower than on initial orders, because WorldCom has already obtained the customer's address and feature information and successfully submitted it to Qwest on its initial order.

31. AT&T submitted a change request to alter the time frame for updating the CSR to 24 hours. In other BOCs, it typically takes a day or two to update the CSR, not the 5-7 days it takes in the Qwest region. Nonetheless, Qwest has indicated that it will not accept AT&T change request, meaning that this problem will continue.

Transmission of Jeopardies After FOCs

32. As I previously discussed, during the third-party test, Qwest repeatedly returned rejects after transmitting firm order confirmations ("FOCs"). Rather than resolving this problem, Qwest apparently transformed the rejects into jeopardies and began submitting jeopardies after FOCs.

33. Qwest attempts to justify transmission of jeopardies after FOCs. Qwest July 10 *ex* parte letter, Tab 6. But most of the reasons Qwest lists explain why Qwest would submit a real jeopardy after a FOC, not why it would transmit a jeopardy that is actually a reject. For example, Qwest says that it will transmit a jeopardy as a result of a customer-caused delay. That is indeed perfectly appropriate, but is irrelevant to the issue at hand since this is not a jeopardy that should be a reject. Qwest does acknowledge that one of the reasons it transmits jeopardies after FOCs is that "[t]he CLEC LSR is not complete and accurate. The Qwest center overlooks the error prior to creating service orders and issuing the FOC. The error is then detected in provisioning. For example, the CLEC has omitted supplemental address information that is required." *Id*. Indeed, it was for just this type of reason that WorldCom received jeopardies after FOCs. But errors such as address errors should be found before a FOC is transmitted, not afterwards. And a reject, not a jeopardy, should be transmitted for such errors.

34. Additionally, in those instances where Qwest should send jeopardies, it must send them on time. Qwest's performance in returning jeopardy notices remains poor. (Per Results (PO-8D)).

Manual Processing

35. Qwest has submitted no new information to refute the fact that it processes too many orders manually and makes too many errors during the course of manual processing – even at today's low order volumes. Indeed, the new data submitted by Qwest show that manual processing remains high – only 50.9% of UNE-P orders flowed through in June (Performance Results (PO-2A-2)) and only 86.5% even of eligible UNE-P orders flowed through (Performance Results (PO-2B-2)). Moreover, flow-through performance is poor for every CLECs that is submitting a high number of orders. The highest flow through percentage for any CLEC that had submitted at least 5,000 LSRs was 76.24% -- not a very high flow through rate for the very best CLEC. July 12 *ex parte*.

36. The high level of manual processing harms CLECs. Qwest claims that its manual processing is not error prone, but as the Department of Justice notes, KPMG found significant errors during testing. DOJ Eval. at 20-21. The Department of Justice further concludes that the data that Qwest submitted to show it processes service orders accurately was limited to analysis of a single field (the APP date field). DOJ Eval. at 22 n. 97. Qwest subsequently submitted one month of data regarding service order accuracy, but that data actually shows very poor performance – a nearly 10% error rate on POTS resale orders (Perf. Results (PO-20)). Even if the results were far better, one month of data based on today's very limited order volume would show very little – especially since no one has audited these performance results.

37. In addition, Qwest itself has acknowledged significant manual errors historically. For example, Qwest's own data show that a high percentage of manually processed LSRs are immediately rejected by the Service Delivery Coordinators, indicating a high level of manual errors. July 12 *ex parte.* Qwest also states that "Liberty's aggregate results demonstrate that 6% of historic unbundled loop orders contain human error" although Qwest states that the errors did not harm CLECs. Qwest July 10 *ex parte* letter, Tab 5. The percentage of manually processed loop orders with errors is presumably much higher than the percentage of all loops with errors. And whether or not these particular errors harmed CLECs, the existence of such a high number of manual errors makes harm to CLECs inevitable. Especially in the absence of reliable, long term, audited data on service order accuracy, there is no basis for concluding that Qwest can perform acceptably with existing levels of manual processing. Certainly, there is no evidence that Qwest can do so with commercial volumes of orders.

38. The Idaho Public Utilities Commission acknowledges in its Comments the problems with high levels of manual processing (pp. 6-7). It suggests the problem can be resolved with additional reporting and monitoring. But the problem should be resolved prior to section 271 authorization, not after.

Long Processing Time for UNE-P Orders

39. Nothing has changed since I filed my last declaration with respect to the length of time that Qwest takes to process basic UNE-P migration orders. If any change of features is required on such an order, as is required on all of WorldCom's Neighborhood orders, the earliest that a CLEC can request for completion of the order is 3 days. This is far too

long. In every other BOC, the interval is same day in, same day out for a UNE-P migration order.

Maintenance and Repair

40. Qwest's performance data continues to show that it frequently fails to fix troubles on CLEC UNE-P lines when it tries to do so – even on lines for which no dispatch is required. Qwest failed to fix such troubles 16.7% of the time in June. (Performance Results (MR-7C)). As in prior months, this is out of parity with retail performance.

Lack of Auditable Electronic Bills

41. The Department of Justice properly emphasized that Qwest has not shown that it provides auditable electronic bills. The CABS BOS bills for which BellSouth provided a test file on July 1 have been implemented too recently to enable BellSouth to use them as a basis to claim it has auditable electronic bills, as the DOJ found. DOJ Eval. at 23. The CRIS bills that were the only electronic bills Qwest provided when it applied for section 271 authority are not fully auditable.

42. Qwest says that its CRIS bills are auditable. Qwest states that its CRIS bills provide individual bill detail for each end-users' account, as well as summary information. Qwest July 10 *ex parte* letter, Tab 1 at 2-3. But read carefully, Qwest does not say that its CRIS bills contain the USOCs for recurring charges that Qwest itself acknowledges are "important for bill validation." *Id*. at 4. Qwest says that these are provided on the BOS bills but not on the CRIS bills. That was exactly my point in my original declaration. Qwest also does not dispute that it fails to provide service address and adjustment detail on the CRIS bills. Without the USOCs and other detail information, electronic auditing cannot be complete. Moreover, the non-standard nature of CRIS

causes significant problems especially since Qwest's CRIS bills vary in each of its three regional centers.

43. The ability to audit bills is critical. Eschelon describes in its comments substantial billing problems. CLECs must have the means to determine whether such problems exist on their bills.

Change Management

44. With respect to change management, as I explained in my initial declaration, Qwest only recently implemented an acceptable change management proposal. There is not yet any track record to show this new process has been successfully implemented. Although the DOJ states that Qwest has demonstrated a pattern of compliance with some earlier-implemented components of the change management plan, DOJ Eval. at 26, the fact is that Qwest actually deviated significantly from its plan. Lichtenberg Decl. ¶ 77. Eschelon points to further deviation in its Comments (pp. 4-6). Moreover, as I explain below, Qwest has not implemented change requests for inclusion of additional products in its new SATE test environment. Thus, it is vital that Qwest show a pattern of compliance with the new plan. This it has not done.

Lack of an Independent Test Environment That Mirrors Production

45. Qwest also has not made any improvements in SATE to make it better mirror the production environment. The Colorado PUC described SATE as a "significant 'loose end'" remaining in the application. Colorado PUC Comments p. 52.

46. In its *ex parte* filings, Qwest acknowledges an approximately 22% variance in the error messages coded into SATE with those in production. July 15 *ex parte* at 2. Qwest includes a long list of error responses that differ between SATE and production. Qwest

July 10 *ex parte* letter, at Tab 14. Among the error messages missing in SATE are common errors such as "No exact match was found for the address provided….Multiple addresses were found for the address"; "Unable to Validate Address"; and "Due date requested has passed." Qwest seems to believe that publication of the list of differences means it is acceptable for such disparities to exist. This is not so. If CLECs receive a different message in the test environment than is expected in production, they are not assured of what the response will be in production. Moreover, the error responses are not all that differs. As I previously explained, when CLECs send a pre-order inquiry with the thoroughfare "DRIVE," and the proper designation is "DR," Qwest will respond that there is no match in SATE but will respond that there is a near match or exact match in production. Lichtenberg Decl. ¶ 87. This not a difference in error messages. And there are likely many other differences of this sort. Qwest does not discuss such differences in its *ex parte* filings.

47. Finally, there are 26 products that cannot be tested in SATE. Although CLECs may not ever order some of these products, CLECs did submit change requests asking that 10 of them be coded into SATE. Some of these have been outstanding for 7 months or more.

48. The DOJ relied on this Commission's prior Orders to conclude that a test environment does not have to be identical to production. DOJ Eval. at 29. But the Commission's prior conclusions on this point indicated that a test environment did not have to mirror flow-through or response times of production. The Commission did not conclude that it was acceptable for a BOC to establish a test environment in which CLECs received different responses than they would receive in production. This significantly undermines the significance of any results obtained during testing.

49. The DOJ also relies on the fact that SATE's accuracy has been close to the benchmark of 95 percent compliance with documentation and business rules. DOJ Eval. at 30. Even if this is so, however, this does not show that SATE is adequate. Depending on what the business rules and documentation say, SATE could be 100% compliant with the business rules and documentation, yet yield completely different results than the production environment. As the DOJ notes, Qwest does not yet measure the extent to which SATE mirrors real-world production results. DOJ Eval. at 30. As DOJ says, this is a "large, unresolved concern." DOJ Eval. at 30. SATE should mirror production before Qwest enters the long distance market.

I declare under penalty of perjury that the foregoing is true and correct.

_____///s////_____

Sherry Lichtenberg

Executed on: _____